

NICHOLAS M. WIECZOREK
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Attorney for Defendant BAXA CORPORATION

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KATHLEEN SHINN and RICHARD SHINN,
Individually, as Heirs and as Personal Co-
Administrators of the Estate of ALYSSA SHINN,
Deceased,

Plaintiffs,

vs.

BAXA CORPORATION; MCKESSON
CORPORATION, a Delaware Corporation; DOES 1
through 50, and ROE CORPORATIONS 1 through 20;

Defendants.

Case No.: 2:07-CV-01648-JCM-PAL

**STIPULATION AND ORDER TO
CONTINUE BRIEFING AND HEARING
OF MOTION TO INTERVENE AND
MOTION FOR DETERMINATION OF
GOOD FAITH SETTLEMENT**

(First Request)

Plaintiffs Kathleen Shinn and Richard Shinn ("Plaintiffs"), by and through their counsel Richard Harris Law Firm, Defendant Baxa Corporation ("Baxa"), by and through its counsel Morris Polich & Purdy LLP, Defendant McKesson Corporation ("McKesson"), by and through its counsel Lauria, Tokunaga, Gates & Linn, LLP, and Summerlin Hospital Medical Center ("Summerlin"), by and through its counsel Hall Prangle & Schoonveld, LLC, hereby stipulate to extend the filing deadlines for Baxa's response to Summerlin's Motion to Intervene and for Determination of Good Faith Settlement [Doc 23], filed on April 1, 2008, to May 19, 2008, and Summerlin's reply to Baxa's response for a period of eleven (11) days following the service of Baxa's response.

This is the first requested extension.

1 This extension is required for Summerlin's full and complete disclosure and production of
2 materials and records requested pursuant to Baxa's Notice of Taking Deposition of Custodian of
3 Records of Summerlin Hospital Medical Center and Subpoena Duces Tecum served on March 3, 2008.
4 The requested materials are necessary for Baxa to craft a clear and comprehensive response to the
5 statements and arguments made by Summerlin. Baxa requires the review and analysis of the materials
6 to be produced by Summerlin Hospital prior to responding to Summerlin's motion.

7 The parties request that the hearing of Summerlin's Motion to Intervene and for Determination
8 of Good Faith Settlement [Doc 23] be continued for a period of thirty (30) days following briefing to
9 allow for complete consideration by the parties.

10 The extension is also requested to allow Plaintiffs and Defendant Baxa Corporation to schedule
11 mediation in an attempt resolve this matter prior to the hearing of said Motion.

12 **IT IS SO STIPULATED.**

13 **MORRIS POLICH & PURDY LLP**

14
15 DATED this 16 day of April, 2008.

16 By: 

NICHOLAS M. WIECZOREK

Nevada Bar No. 6170

JEANINE OLIVARES NAVARRO

Nevada Bar No. 10174

3930 Howard Hughes Parkway, Suite 360

Las Vegas, Nevada 89169

Attorney for Defendant *Baxa Corporation*

17
18
19
20 **RICHARD HARRIS LAW FIRM**

21
22 DATED this ____ day of April, 2008.

23 By: _____

RICHARD HARRIS, ESQ.

Nevada Bar No. 505

KERRY L. EARLEY, ESQ.

Nevada Bar No. 2298

801 South Fourth Street

Las Vegas, Nevada 89101

Attorneys for Plaintiffs

Kathleen Shinn and Richard Shinn

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11 mediation in an attempt resolve this matter prior to the hearing of said Motion.

12 **IT IS SO STIPULATED.**

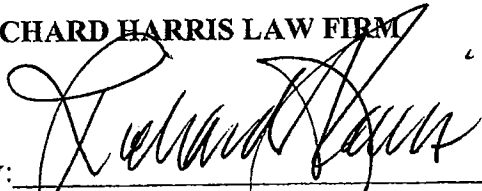
13 **MORRIS POLICH & PURDY LLP**

14
15 DATED this ____ day of April, 2008.

16 By: _____
17 NICHOLAS M. WIECZOREK
18 Nevada Bar No. 6170
19 JEANINE OLIVARES NAVARRO
20 Nevada Bar No. 10174
21 3930 Howard Hughes Parkway, Suite 360
22 Las Vegas, Nevada 89169
23 Attorney for Defendant *Baxa Corporation*

24
25 DATED this 15th day of April, 2008.

26 **RICHARD HARRIS LAW FIRM**

27 By: 
28 RICHARD HARRIS, ESQ.
Nevada Bar No. 505
KERRY L. EARLEY, ESQ.
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801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiffs
Kathleen Shinn and Richard Shinn

LAURIA, TOKUNAGA, GATES & LINN, LLP

DATED this 16 day of April, 2008.

By: 9693 ER
ANTHONY D. LAURIA, ESQ.
Nevada Bar No. 4114
601 South Seventh Street
Las Vegas, Nevada 89101
Attorneys for Defendant McKesson Corporation

HALL, PRANGLE & SCHOONVELD, LLC

DATED this ____ day of April, 2008.

By: _____
MICHAEL E. PRANGLE, ESQ.
Nevada Bar No. 8619
KENNETH M. WEBSTER, ESQ.
Nevada Bar No. 7205
777 North Rainbow Boulevard, Suite 225
Las Vegas, Nevada 89107
Attorneys for Summerlin Hospital

ORDER

IT IS SO ORDERED that Baxa Corporation's Response to Summerlin Hospital Medical Center's Motion to Intervene and for Determination of Good Faith Settlement is due May 19, 2008; Summerlin Hospital Medical Center's Reply to Baxa's Response is due eleven (11) days following the service of Baxa's response; and the hearing of Summerlin Hospital Medical Center's Motion to Intervene and for Determination of Good Faith Settlement is continued to

DATED: _____

UNITED STATES MAGISTRATE JUDGE

LAURIA, TOKUNAGA, GATES & LINN, LLP

DATED this ____ day of April, 2008.

By:

ANTHONY D. LAURIA, ESQ.

Nevada Bar No. 4114

601 South Seventh Street

Las Vegas, Nevada 89101

Attorneys for Defendant McKesson Corporation

HALL, PRANGLE & SCHOONVELD, LLC

DATED this 16th day of April, 2008.

By:

 8452/for
MICHAEL E. PRANGLE, ESQ.

Nevada Bar No. 8619

KENNETH M. WEBSTER, ESQ.

Nevada Bar No. 7205

777 North Rainbow Boulevard, Suite 225

Las Vegas, Nevada 89107

Attorneys for Summerlin Hospital

ORDER

IT IS SO ORDERED that Baxa Corporation's Response to Summerlin Hospital Medical Center's Motion to Intervene and for Determination of Good Faith Settlement is due May 19, 2008; Summerlin Hospital Medical Center's Reply to Baxa's Response is due eleven (11) days following the service of Baxa's response; and the hearing of Summerlin Hospital Medical Center's Motion to Intervene and for Determination of Good Faith Settlement is continued to

DATED: _____

UNITED STATES MAGISTRATE JUDGE